

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE:

Faye T. Pantazelos

Debtor

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Bankruptcy No. 15B 08916
Chapter 13

Judge Jack Schmetterer

To: See Attached List

NOTICE OF MOTION

PLEASE TAKE NOTICE that on **August 12, 2015**, at the hour of 11:00 A.M., or as soon thereafter as counsel may be heard, I shall appear before the honorable Jack Schmetterer at the US Bankruptcy Court, 219 South Dearborn, Courtroom 682, Chicago, IL 60604, or any other judge sitting in his place and stead, and shall then and there present the attached **Motion to Quash Subpoena**, a copy of which is hereby served upon you. You may appear if you so choose.

David P. Lloyd
615B S. LaGrange Rd.
LaGrange IL 60525
708-937-1264
Fax: 708-937-1265

CERTIFICATE OF SERVICE

I, David P. Lloyd, an attorney, certify that I caused a copy of the foregoing Notice and Motion to be served on the parties listed on the attached service list by electronic notice where indicated, or by first class mail by depositing with the United States Postal Service, LaGrange, Illinois, postage prepaid, prior to 5:00 P.M., this 7th day of August, 2015.

/s/ David P. Lloyd

David P. Lloyd

Service List
Faye T. Pantazelos
15 B 08916

Tom Vaughn, Trustee
chiweb@tvch13.net

Paul Bach
ecfbach@gmail.com

J. Kevin Benjamin
courtnotices@blsllp.com

Justin F. Carter
jcarter@morrislaing.com

Jennifer O'Reilly
joreilly@llegal.com

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MOTION TO QUASH SUBPOENA

NOW COMES Faye T. Pantazelos, the Debtor herein, by and through her attorneys, David P. Lloyd, Ltd., and moves this honorable Court to quash a subpoena issued by J. Kevin Benjamin, and in support thereof states as follows:

1. The Debtor commenced this case by filing a voluntary Chapter 13 petition on March 13, 2015.

2. On June 3, 2015, J. Kevin Benjamin ("Benjamin") filed a motion for authorization to conduct an examination of the Debtor pursuant to Rule 2004 of the Federal Rules of Bankruptcy Procedure.

3. On July 8, 2015, the Court granted Benjamin's motion, by Order entered July 10, 2015.

4. On or about July 29, 2015, Benjamin executed a Subpoena for Rule 2004 Examination, a copy of which is attached hereto.

5. The Subpoena was served on the Debtor on the night of August 5, 2015, by a person identifying himself as a Cook County Sheriff. The Subpoena requires the Debtor's attendance at a deposition on August 11, 2015, and requests a large volume of documentation by that date, a mere five days after service of the Subpoena.

6. The Debtor has filed a motion to vacate the Rule 2004 examination Order entered July

10, on the ground that it was procured by mistake, fraud, or misrepresentation. That motion is set for hearing on August 12, 2015.

7. The Court should vacate the Rule 2004 Order and quash the subpoena.

8. If the Court does not quash the Subpoena on this Motion, the Debtor requests an extension of time to object to specific items requested in the Subpoena, and additional time to comply with its burdensome requests.

WHEREFORE Faye T. Pantazelos, the Debtor herein, prays that the Subpoena executed by J. Kevin Benjamin on or about July 29, 2015, be quashed, and for such other and further relief as this honorable Court may deem meet.

Respectfully submitted,
Faye T. Pantazelos

By: /s/ David P. Lloyd
One of her attorneys

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